

EXHIBIT 34

1 UNITED STATES DISTRICT COURT FOR THE
2 NORTHERN DISTRICT OF CALIFORNIA
3
4

5 Alicia Hernandez, et al.,

6 Plaintiffs,

7 vs.

File No. 18-cv-07354

8 Wells Fargo Bank, N.A.,

9 Defendant.
10
11
12

13 VIDEOTAPED DEPOSITION OF
14 DIANE M. YOUNG
15
16

17 Taken on July 19, 2019

18 Commencing at 9:32 a.m.
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25 REPORTED BY: PAULA K. RICHTER, RMR, CRR, CRC

Page 1

1	BY MR. BLOOMFIELD:	11:33:52
2	Q. And what would that entail, creating that	11:33:52
3	pop-up for the HPA tool?	11:33:57
4	MS. SMEDLEY: Object to form.	11:33:59
5	THE WITNESS: It would have entailed	11:34:02
6	a technology update.	11:34:04
7	BY MR. BLOOMFIELD:	11:34:09
8	Q. And how does the process for a technology	11:34:09
9	update work?	11:34:11
10	MS. SMEDLEY: Object to form.	11:34:13
11	THE WITNESS: So I'm not sure I	11:34:16
12	understood the question. I'm sorry.	11:34:25
13	BY MR. BLOOMFIELD:	11:34:27
14	Q. In general, if you want to implement a	11:34:27
15	technology update, what does that require?	11:34:30
16	A. It requires --	11:34:32
17	MS. SMEDLEY: Object to form.	11:34:34
18	THE WITNESS: It requires approval	11:34:35
19	for funding, so the funding would have to be	11:34:36
20	approved for that update. And then you just would	11:34:44
21	have to -- once the funding is approved, then you	11:34:51
22	can move forward with the request for the	11:34:56
23	technology update with our release management	11:34:57
24	team.	11:35:05
25	BY MR. BLOOMFIELD:	11:35:05

1 Q. Okay. So until the funding is in place, it's 11:35:05
2 not possible to move forward with the technology 11:35:08
3 update; is that correct? 11:35:10
4 A. That's correct. 11:35:11
5 Q. And the funding that you refer to, where does 11:35:12
6 that money go? 11:35:25
7 MS. SMEDLEY: Object to form. 11:35:27
8 THE WITNESS: Where does it go? 11:35:30
9 It -- 11:35:32
10 BY MR. BLOOMFIELD: 11:35:32
11 Q. Why is funding required? 11:35:32
12 A. Because there's a -- 11:35:34
13 MS. SMEDLEY: Object to form. 11:35:35
14 THE WITNESS: There's a cost 11:35:37
15 involved for making the updates to the system, and 11:35:39
16 that cost covers a number of different components. 11:35:43
17 The testers, the people who write the test 11:35:50
18 scripts. I mean, a number of different costs are 11:35:56
19 involved. 11:36:00
20 BY MR. BLOOMFIELD: 11:36:00
21 Q. So is that a matter of allocating internal 11:36:01
22 Wells Fargo resources? 11:36:04
23 MS. SMEDLEY: Object to form. 11:36:08
24 THE WITNESS: Yes. 11:36:09
25 BY MR. BLOOMFIELD: 11:36:12

1 Q. So in other words, funding could refer to the 11:36:13
2 time that's being spent by Wells Fargo's 11:36:20
3 technology people to actually do the programming 11:36:25
4 or the -- whatever it takes to actually execute 11:36:30
5 the technology update; is that correct? 11:36:33
6 MS. SMEDLEY: Object to form. 11:36:35
7 THE WITNESS: That's correct. 11:36:37
8 (Exhibit 364 was marked for 11:36:57
9 identification.) 11:37:08
10 BY MR. BLOOMFIELD: 11:37:08
11 Q. Ms. Young, you've been handed what's been 11:37:35
12 marked as Exhibit 364. Please let me know when 11:37:38
13 you're ready to discuss it. 11:37:45
14 A. I'm ready. 11:37:46
15 Q. This looks like an e-mail that you sent to 11:37:47
16 yourself and Tom Wayne on November 13th, 2014; is 11:37:55
17 that correct? 11:38:05
18 A. Correct. 11:38:06
19 Q. And what was the purpose of this e-mail? 11:38:06
20 A. For me to have a better understanding of what 11:38:13
21 they were requesting. 11:38:23
22 Q. Was Tom part of the unit that was requesting 11:38:23
23 this change? 11:38:34
24 MS. SMEDLEY: Object to form. 11:38:36
25 THE WITNESS: Yes. 11:38:37

1 couldn't answer. So, for example, how we arrived 12:14:30
2 at a dollar amount, if there was a component of 12:14:34
3 that that we didn't have an answer for, then we 12:14:37
4 would be rescheduled to re-present. 12:14:41
5 BY MR. BLOOMFIELD: 12:14:44
6 Q. Okay. So it was likely a follow-up to the 12:14:44
7 January 26th business review? 12:14:47
8 A. Yes. 12:14:50
9 MS. SMEDLEY: Object to form. 12:14:51
10 BY MR. BLOOMFIELD: 12:14:59
11 Q. Now, I note in Exhibit 369 the requesting 12:15:00
12 unit is listed as HPU rather than liquidations. 12:15:10
13 Do you know why that change was made? 12:15:14
14 MS. SMEDLEY: Object to form. 12:15:23
15 THE WITNESS: I don't -- I remember 12:15:25
16 that there was conversation about which unit 12:15:27
17 should be responsible for the funding, but I -- 12:15:32
18 and I believe that that may be why it was rolled 12:15:39
19 up into the HPU. 12:15:45
20 BY MR. BLOOMFIELD: 12:15:47
21 Q. And that conversation was whether it should 12:15:47
22 be liquidations or HPU, in your recollection? 12:15:49
23 A. Yes. 12:15:53
24 Q. And what was the result of your January 30th 12:15:54
25 presentation at the business case review with 12:16:04

1 Ms. Menon? 12:16:12

2 MS. SMEDLEY: Object to form. 12:16:14

3 THE WITNESS: We did not have 12:16:15

4 funding. 12:16:17

5 BY MR. BLOOMFIELD: 12:16:21

6 Q. Were you informed of that decision at the 12:16:21

7 business case review? 12:16:24

8 MS. SMEDLEY: Object to form. 12:16:26

9 THE WITNESS: No, I don't believe 12:16:28

10 so. 12:16:32

11 BY MR. BLOOMFIELD: 12:16:32

12 Q. Do you remember when you were informed? 12:16:33

13 MS. SMEDLEY: Object to form. 12:16:35

14 THE WITNESS: It was after the fact, 12:16:38

15 but I don't remember how long after the fact. 12:16:42

16 Possibly a week to two weeks. 12:16:47

17 BY MR. BLOOMFIELD: 12:16:53

18 Q. And who informed you? 12:16:53

19 MS. SMEDLEY: Object to form. 12:16:57

20 THE WITNESS: I think -- I think it 12:17:00

21 was Stephanie Day, who worked in our finance area 12:17:02

22 of the PMO. 12:17:08

23 BY MR. BLOOMFIELD: 12:17:11

24 Q. And is she the person that generally relays 12:17:11

25 that information -- 12:17:16

1	MS. SMEDLEY: Object to form.	02:00:01
2	THE WITNESS: Yes.	02:00:04
3	BY MR. BLOOMFIELD:	02:00:04
4	Q. And the project was expected to impact in	02:00:08
5	excess of a quarter million loans, according to	02:00:14
6	this table at the top; is that correct?	02:00:18
7	MS. SMEDLEY: Object to form.	02:00:21
8	THE WITNESS: Yes.	02:00:22
9	BY MR. BLOOMFIELD:	02:00:22
10	Q. In your experience, is roughly \$62,000 a lot	02:00:32
11	of money to seek for the funding of one of your	02:00:37
12	projects?	02:00:42
13	MS. SMEDLEY: Object to form.	02:00:43
14	THE WITNESS: Are you asking one of	02:00:47
15	my projects specifically or a project in general?	02:00:48
16	BY MR. BLOOMFIELD:	02:00:51
17	Q. Well, first -- first you specifically and	02:00:51
18	then I'll ask about in general.	02:00:54
19	A. No, it isn't.	02:00:58
20	Q. And what about for projects in general?	02:01:00
21	A. No.	02:01:06
22	Q. Did it surprise you that a request for this	02:01:06
23	relatively small amount of funding was rejected in	02:01:24
24	this case?	02:01:29
25	MS. SMEDLEY: Object to form.	02:01:31

